



THE CITY OF NEW YORK LAW DEPARTMENT

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June 20, 2025

By ECF

MURIEL GOODE-TRUFANT

Corporation Counsel

Honorable Jessica G. L. Clarke United States District Judge Southern District of New York 500 Pearl Street New York, New York, 10007

> Re: Saunders v. City of New York, et al.,

> > 24 Civ. 00910 (JGLC)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and assigned to the defense of the above referenced matter. Defendant City writes on behalf of the parties to respond to the Court's June 19, 2025, Order and to respectfully request the Court to adjourn the conference currently scheduled for June 24, 2025, at 4:00 p.m. This is the third request to adjourn the instant conference.

The parties have continued to make progress towards the settlement of this matter and do not believe a conference is necessary currently. The only remaining issue relates to carveouts. The parties make this application in a continued effort to conserve time and resources. Should the parties be unable to resolve the matter, they will be prepared to address the motion before the Court, at a later date.

For the convenience of the Court, the parties have conferred and determined that they are available on July 7th, 9th, 11th, 14th, 16th, 17, or 21st, or on another day and time that is more suitable for the Court. Should the parties be unable to resolve before the next scheduled conference, they would be prepared to provide the Court with a letter outlining the outstanding issues one-week in advance.

The parties thank the Court for its time and consideration herein.

Respectfully submitted,

/s/

Joseph Zangrilli Senior Counsel Special Federal Litigation Cc: VIA ECF

Attorneys for Plaintiff Robert Rickner, Esq. Sara Wolfensdorfer, Esq. Application GRANTED. IT IS HEREBY ORDERED that the conference in this matter, previously scheduled for June 24, 2025 at 4:00 p.m., is RESCHEDULED for July 16, 2025 at 11:00 a.m. in Courtroom 11B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York. The parties are hereby ORDERED to file a joint status letter updating the Court on the status of their settlement discussions by no later than July 8, 2025. The Clerk of Court is respectfully directed to terminate ECF No. 36.

SO ORDERED.

JESSICA G. L. CLARKE United States District Judge

Jessica Clarke

Dated: June 23, 2025 New York, New York